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# BORAH, GOLDSTEIN, ALTSCHULER, NAHINS & GOIDEL, P.C.

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October 30, 2013

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## Via ECF

Honorable Denise L. Cote  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007-1312

Re: Shimshon Wexler v. Borah, Goldstein, Altschuler,  
 Nahins & Goldstein, P.C.; Stephen C. Shulman  
 United States District Court, Southern District of NY  
Case No.: 13-cv-07134 (DLC)

Honorable Judge Cote:

This firm and one of its partners, Stephen C. Shulman, are the Defendants in the above-referenced matter. We respectfully request an extension of time for the Defendants to answer, move or otherwise respond to the Complaint from November 8, 2013 to and including December 2, 2013.

Accompanying this letter is a Stipulation Extending Defendants' Time to Answer to December 2, 2013, which has been signed by counsel for Plaintiff and by me as a member of the firm.

This is the first request by Defendants for an extension of time to answer and is being made in order to provide Defendants with sufficient time to negotiate a possible settlement and/or to investigate and respond to the Complaint.

BORAH, GOLDSTEIN, ALTSCHULER, NAHINS & GOIDEL, P.C.

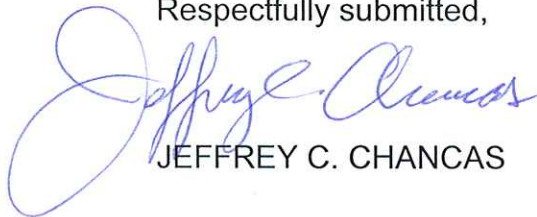
Honorable Denise L. Cote  
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There are no scheduled dates.

I respectfully request that the Court grant this extension and so-order the accompanying Stipulation.

Thank you.

Respectfully submitted,



JEFFREY C. CHANCAS

cc: Via E-Mail  
acohen@cohenlawpc.net  
Aaron Cohen, Esq.  
The Cohen Law Office, P.C.  
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK (FOLEY SQUARE)

-----X  
SHIMSHON WEXLER, on behalf of himself and all others  
similarly situated,

Plaintiff,

-against-

BORAH, GOLDSTEIN, ALTSCHULER, NAHINS & GOIDEL,  
PC; STEPHEN C. SHULMAN,

Defendants.  
-----X

Index No.: 1:13-  
cv-07134-PAC

ECF CASE

STIPULATION  
EXTENDING  
TIME TO  
ANSWER

IT IS HEREBY STIPULATED AND AGREED, by and between  
counsel for Plaintiff and Defendants as follows:

1. The time for Defendants to answer, move, or otherwise  
respond to the Complaint is extended to and including December 2, 2013.

2. This is the first request by Defendants for an extension of  
time to answer, move, or otherwise respond to the Complaint, and is being made  
in order to provide Defendants with sufficient time to negotiate a possible  
settlement and/or to investigate and respond to the Complaint.

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3. This Stipulation may be executed in one or more counterparts, each of which will be deemed an original and all of which together will constitute one instrument.

Dated: New York, New York  
October 29, 2013

THE COHEN LAW OFFICE, PC  
Attorneys for Plaintiff

By:   
\_\_\_\_\_  
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BORAH, GOLDSTEIN, ALTSCHULER,  
NAHINS & GOIDEL, P.C. and  
STEPHEN C. SHULMAN  
(A Member of the Firm)  
Defendants *Pro Se*

By:   
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SO ORDERED:

\_\_\_\_\_  
DENISE L. COTE  
U.S.D.J.

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